

IN THE DRAWINGS

Enclosed are Figures 1-5 with the corrected drawing sheets shown in red in compliance with 37 C.F.R. 1.121(d). The drawings are labeled as REPLACEMENT SHEETS in compliance with the rules. The drawings do not introduce any new matter into the application.

REMARKS

This Amendment is submitted in response to the Office Action dated June 13, 2005. In the Office Action, the Patent Office objected to the drawings because reference numerals 19 and 99 are not shown. The office requested that corrected drawings be submitted in compliance with 37 CFR 1.121(d). The Office further objected to Claims 1-3 because of informalities. Moreover, the patent office rejected Claims 1-3, 6-8 and 13 under 35 U.S.C. §102(b) as being anticipated by *Lautin* (United States Patent Number 2,964,937). Additionally, the patent office rejected Claims 1-3, 6-8 and 13 under 35 U.S.C. § 102(b) as being anticipated by *Isenmann* (United States Patent No.: 3,979,934); and rejected Claims 1-3, 6-8 and 13 under 35 U.S.C. § 102(b) as being anticipated by *Klose* (United States Patent No.: 4,422,315). Finally, the patent Office rejected Claim 12 under 35 U.S.C. § 103(a) as being unpatentable over *Isenmann* in view of *Ros* (U.S. Patent No.: 4,713,951).

In the Office Action, the Patent Office objected to the specification for the following informalities: Throughout the abstract, the term means should not be used. In response to this objection, applicant has amended the abstract such that the use of the term “means” is no longer used. Applicant submits that the objection has been overcome and requests notice of the same. Further, the Patent Office objected to the following informalities: On page 5, line 19, “as” should be replaced with –a--. On page 7, line 9, “Figures 7a and 7b” is incorrect. On page 10, line 16, “slot 17” is inconsistent with page 10, line 9 (docking port 17). “On page 13, line 7, “he” should be replaced with –the--. In response to the objections, Applicant amended the appropriate paragraphs on the specification to overcome the objections. Specifically, applicant amends page 5, line 19 wherein “as” is replaced with –a--. On page 7, line 9, Figures 7a and 7b is replaced with –Figure 10--; and on page 10, line 16, slot 17 now reads “slot 77”. Applicant submits that the appropriate corrections have been made and the amendments overcome the rejection to the specification. Notice to that effect is requested.

The Patent Office objected to the drawings because reference number 19 (page 7, line 11) and reference numeral 99 (page 10, line 18) are not shown. The Patent Office requested that corrected drawing sheets in compliance with 37 CFR 1.121(d) be submitted. Applicant submits herewith corrected drawings showing reference numerals 19 and 99. Applicant respectfully

submits that the objection has been overcome. Notice to that effect is requested.

The Patent Office rejected Claims 1-3, 6-8 and 13 under 35 U.S.C. §102(b) as being anticipated by *Lautin*. The Patent Office alleges that *Lautin* teaches an elongated, generally flat case 12, a docking port 16, 24, first means 27, 60 for attaching the case to a carrying element 52, a tag 14, second means 34 for attaching the tag to keys 40, a docking button 32 for snap fitting in the port, the docking button and docking port being mutually planar, a single docking port 16, 24 in Figure 1 and plural buttons and docking ports in Figure 4, means 27, 60 for attaching more than one case together in end-to-end fashion, a side loop and a spring arm

Lautin teaches a key chain with a separable key chain which permits attachment and detachment of a key. The invention allows for detachment of a key from the key chain so that the remaining keys on the key chain can be carried on the person while being able to detach individual keys from the chain. The key chain has a base member having a rectangular hole extending longitudinally therethrough, and a notch through a wall of the base member. The invention also has a tongue integral with the plate and projecting beyond a surface of the plate, the tongue being engagable with the end surface of the notch in the base member when the plate is inserted in the base member to reliably secure the plate into the base member.

Amended Claim 1 requires a key inventory chest having a case having a docking port formed therein that has a first means for attaching the case to a carrying element. Moreover Amended Claim 1 requires a tag including a second means for attaching said tag to keys. The tag further has a docking button, spaced apart from said second means, of a size and shape for lockable engagement in the docking port to temporarily fasten the keys in the case wherein the second means is the combination of a small aperture through which a locking ring is threaded. Additionally, amended Claim 1 requires a docking button that is arranged for snap-in fitting and locking into the docking port and releasable therefrom by digital pressure applied to said button.

Lautin does not teach or suggest a second means for attaching said tag to keys wherein the tag has a docking button, spaced apart from said second means, of a size and shape for lockable engagement in the docking port to temporarily fasten the keys in the case wherein the second means is the combination of a small aperture through which a locking ring is threaded as required by Amended Claim 1 of the present invention. Additionally, *Lautin* does not teach or

suggest a docking button that is arranged for snap-in fitting and locking into the docking port and releasable therefrom by digital pressure applied to said button as required by Claim 1.

Under 35 U.S.C. §102(b), anticipation requires that a single reference disclose each and every element of Applicant's claimed invention. *Akzo N.V. v. U.S. International Trade Commission*, 808 F.2d 1471, 1479, 1 USPQ 2d 1241, 1245 (Fed. Cir. 1986).

Moreover, anticipation is not shown even if the differences between the claims and the reference are "insubstantial" and one skilled in the art could supply the missing elements. *Structure Rubber Products Co. v. Park Rubber Co.*, 749 F.2d 707, 716, 223 USPQ 1264, 1270 (Fed. Cir. 1984).

In view of the foregoing remarks and amendments, the rejection of Claims 1-3, 6-8 and 13 under 35 U.S.C. §102(b) as being anticipated by *Lautin* have been overcome and should be withdrawn. Notice to that effect is requested.

Claims 1, 2, 6-8 and 13 were rejected under 35 U.S.C. § 102(b) as being anticipated by *Isenmann*. The Patent Office alleges that *Isenmann* teaches a flat, elongated case, first means which enables the case to be attached to a carrying element, a docking port within the case, a tag having second means for attaching to keys, a docking button for lockable engagement in the docking port of the case, a spring arm, the button snap-fitting within the docking port, a side loop allows for holding other keys, and the top chain also allows for attaching more than one case together.

Isenmann teaches a releasable key ring connector comprising a plug and socket member shaped to fit together snugly but to separate upon pressure placed on one of them. The key supporting means on each member accommodate separate key rings.

Amended Claim 1 requires a key inventory chest having a case having a docking port formed therein that has a first means for attaching the case to a carrying element. Moreover Amended Claim 1 requires a tag including a second means for attaching said tag to keys. The tag further has a docking button, spaced apart from said second means, of a size and shape for lockable engagement in the docking port to temporarily fasten the keys in the case wherein the second means is the combination of a small aperture through which a locking ring is threaded.

Additionally, amended Claim 1 requires a docking button that is arranged for snap-in fitting and locking into the docking port and releasable therefrom by digital pressure applied to said button.

Isenmann does not teach or suggest a second means for attaching said tag to keys wherein the tag has a docking button, spaced apart from said second means, of a size and shape for lockable engagement in the docking port to temporarily fasten the keys in the case wherein the second means is the combination of a small aperture through which a locking ring is threaded as required by Amended Claim 1 of the present invention. Additionally, *Isenmann* does not teach or suggest a docking button that is arranged for snap-in fitting and locking into the docking port and releasable therefrom by digital pressure applied to said button as required by Claim 1.

Under 35 U.S.C. §102(b), anticipation requires that a single reference disclose each and every element of Applicant's claimed invention. *Akzo N.V. v. U.S. International Trade Commission*, 808 F.2d 1471, 1479, 1 USPQ 2d 1241, 1245 (Fed. Cir. 1986).

Moreover, anticipation is not shown even if the differences between the claims and the reference are "insubstantial" and one skilled in the art could supply the missing elements. *Structure Rubber Products Co. v. Park Rubber Co.*, 749 F.2d 707, 716, 223 USPQ 1264, 1270 (Fed. Cir. 1984).

In view of the foregoing remarks and amendments, the rejection of Claims 1-3, 6-8 and 13 under 35 U.S.C. §102(b) as being anticipated by *Isenmann* have been overcome and should be withdrawn. Notice to that effect is requested.

The Patent Office further states that Claims 1-3, 6-8 and 13 are rejected under 35 U.S.C. §102(b) as being anticipated by *Klose* ('315). The Patent Office alleges that *Klose* teaches a case having a flat elongated shape, a docking port, first means which allows the case to be attached to a carrying element, a tag with a snap fitting docking button for being received in the port, a second means for holding keys, a single docking port and button in Figure 1 and plural ports and buttons in Figure 7, means for attaching more than one case together in end-to-end fashion, a side loop, and a spring arm defined at numeral 30, Figure 3, between the button 8 and the remainder of the tag 3.

Klose teaches a key holder comprising a plate provided with an elastic ring and a detent pawl that is insertable into a flat sleeve. The plate has a notch which receives an end section of the ring. The end section is non-displaceable in its fully inserted position since the notch lies within the opening shaft of the flat sleeve.

Amended Claim 1 requires a key inventory chest having a case having a docking port formed therein that has a first means for attaching the case to a carrying element. Moreover Amended Claim 1 requires a tag including a second means for attaching said tag to keys. The tag further has a docking button, spaced apart from said second means, of a size and shape for lockable engagement in the docking port to temporarily fasten the keys in the case wherein the second means is the combination of a small aperture through which a locking ring is threaded. Additionally, amended Claim 1 requires a docking button that is arranged for snap-in fitting and locking into the docking port and releasable therefrom by digital pressure applied to said button.

Klose does not teach or suggest a second means for attaching said tag to keys wherein the tag has a docking button, spaced apart from said second means, of a size and shape for lockable engagement in the docking port to temporarily fasten the keys in the case wherein the second means is the combination of a small aperture through which a locking ring is threaded as required by Amended Claim 1 of the present invention. Additionally, *Klose* does not teach or suggest a docking button that is arranged for snap-in fitting and locking into the docking port and releasable therefrom by digital pressure applied to said button as required by Claim 1.

Under 35 U.S.C. §102(b), anticipation requires that a single reference disclose each and every element of Applicant's claimed invention. *Akzo N.V. v. U.S. International Trade Commission*, 808 F.2d 1471, 1479, 1 USPQ 2d 1241, 1245 (Fed. Cir. 1986).

Moreover, anticipation is not shown even if the differences between the claims and the reference are "insubstantial" and one skilled in the art could supply the missing elements. *Structure Rubber Products Co. v. Park Rubber Co.*, 749 F.2d. 707, 716, 223 USPQ 1264, 1270 (Fed. Cir. 1984).

In view of the foregoing remarks and amendments, the rejection of Claims 1-3, 6-8 and 13 under 35 U.S.C. §102(b) as being anticipated by *Klose* have been overcome and should be

withdrawn. Notice to that effect is requested.

Finally, the Patent Office states that Claim 12 is rejected under 35 U.S.C. § 103(a) as being unpatentable over *Isenmann* in view of *Ros*. The Patent Office states that *Ros* teaches a circular winding wire 4 and that it would have been obvious to one of ordinary skill in the art at the time the invention was made to substitute a circular winding wire for a key-holding chain of *Isenmann*, in view of the teaching of *Ros*, the motivation being to optimize the strength of the key holding element.

Ros teaches a separate key holder comprising a holder body in which a pin is fitted on either side, each pin being provided with a ring-shaped element for the accommodation of keys. The holder body consists of two portions to be detachably coupled to each other, each of the portions carrying one of the pins. The two portions of the holder body are coupled to one another by a snap connection which can be released by an axial displacement of one of the pins in the respective portion of the holder body.

Isenmann teaches a releasable key ring connector comprising a plug and socket member shaped to fit together snugly but to separate upon pressure placed on one of them. The key supporting means on each member accommodate separate key rings.

However, neither *Isenmann* and/or *Ros*, taken singly or in combination teach or suggest a tag including second means for attaching said tag to keys, said tag further including a docking button, spaced apart from said second means, of a size and shape for lockable engagement in the docking port to temporarily fasten the keys in the case wherein the second means is the combination of a small aperture through which a locking ring is threaded as required by Claim 1 of the present invention.

Further, the Patent Office provided no teaching as to why one having ordinary skill in the art would have been led to modify *Isenmann* in view of *Ros* to create Applicant's invention. Since the Patent Office failed to establish a *prima facie* case of obviousness, the rejection of Claim 12 under 35 U.S.C. §103(a) has been overcome. Notice to that effect is requested.

It is submitted that the question under §103 is whether the totality of the art would collectively suggest the claimed invention to one of ordinary skill in this art. *In re Simon*, 461

F.2d 1387, 174 USPQ 114 (CCPA 1972).

That elements, even distinguishing elements, are disclosed in the art is alone insufficient. It is common to find elements somewhere in the art. Moreover, most if not all elements perform their ordained and expected functions. The test is whether the invention as a whole, in light of the teaching of the reference, would have been obvious to one of ordinary skill in the art at the time the invention was made. *Connell v. Sears, Roebuck & Co.*, 722 F.2d 1542, 220 USPQ 193 (Fed. Cir. 1983).

It is insufficient that the art disclosed components of Applicants' invention. A teaching, suggestion, or incentive must exist to make the combination made by Applicants. *Interconnect Planning Corp. v. Feil*, 774 F.2d 1132, 1143, 227 USPQ 543, 551 (Fed. Cir. 1988).

In view of the foregoing remarks and amendments, the rejection of Claim 12 over *Isenmann* in view of *Ros* under 35 U.S.C. §103(a) have been overcome and should be withdrawn. Notice to that effect is requested.

Claims 2, 3, 6-8 and 12 depend from Claim 1. These claims are further believed allowable over *Isenmann*, *Ros*, *Klose and Lautin*, taken singly or in combination, for the same reasons set forth with respect to independent Claim 1 since each sets forth additional novel components of Applicant's key docking system.

In view of the foregoing remarks, Applicant respectfully submits that all of the claims in the application are in allowable form and that the application is now in condition for allowance. If any outstanding issues remain, Applicant urges the Patent Office to telephone Applicant's attorney so that the same may be resolved and the application expedited to issue. Applicant requests the Patent Office to indicate all claims as allowable and to pass the application to issue.

Please charge any shortage in fees due in connection with the filing of this paper, including extension of time fees, to Deposit Account 502191 and please credit any excess fees to such deposit account

Respectfully submitted,

Dated: December 13, 2005

By: 

Hani Z. Sayed

Registration No. 52,544

RUTAN & TUCKER, LLP
611 Anton Blvd., Suite 1400
Costa Mesa, CA 92626
Phone: (714) 641-5100
Facsimile: (714) 546-9035

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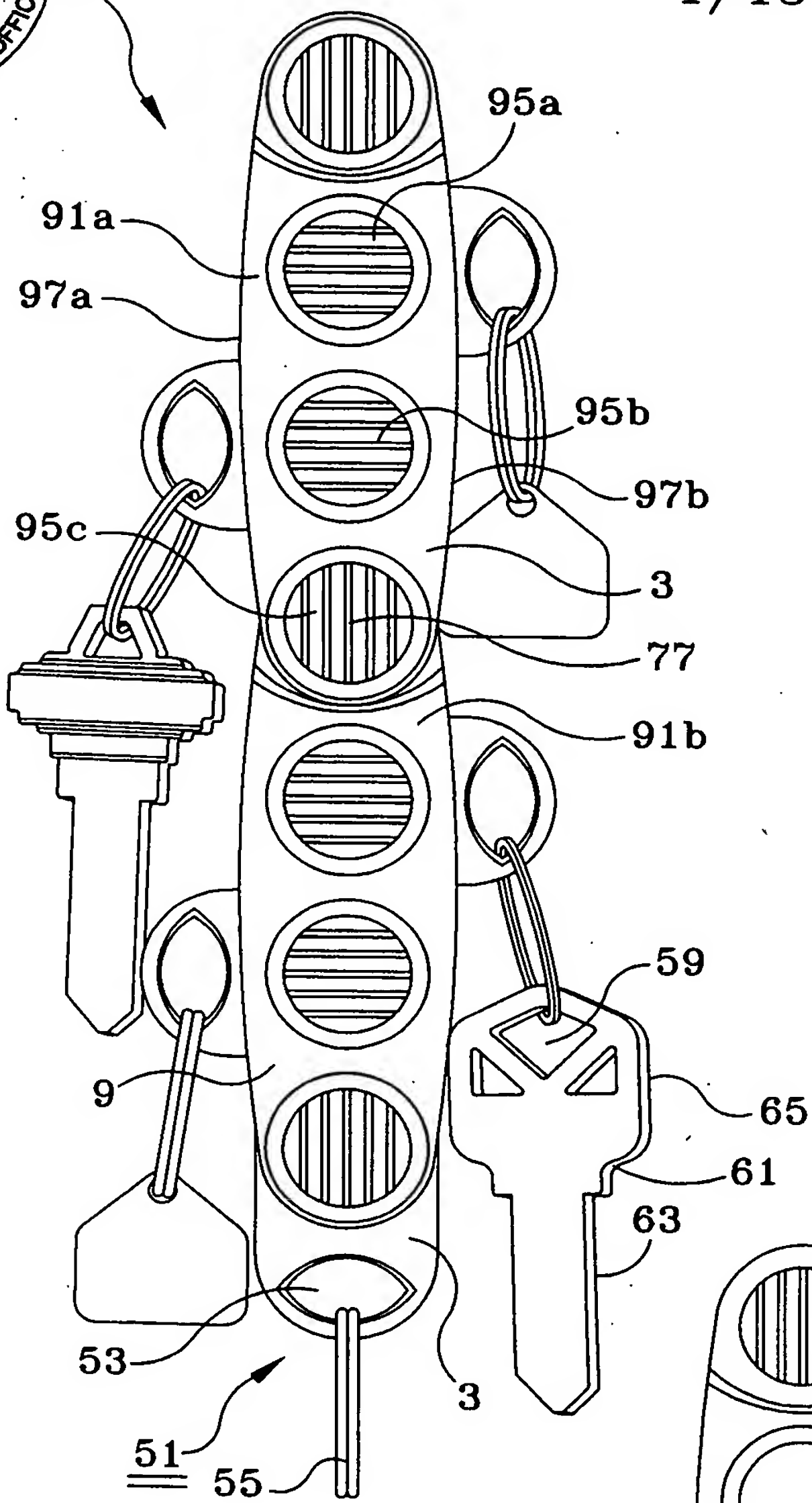


Figure 1

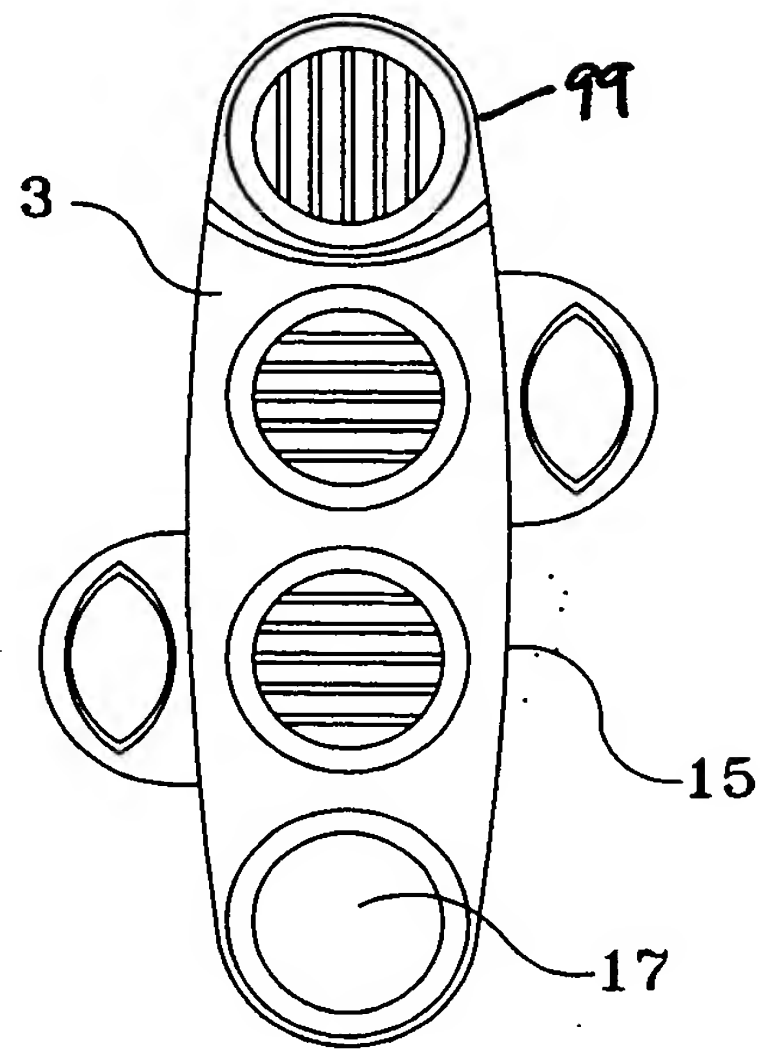


Figure 2

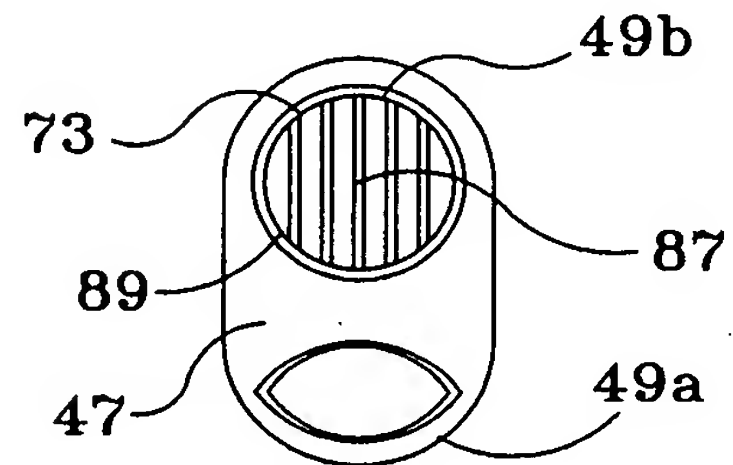


Figure 3

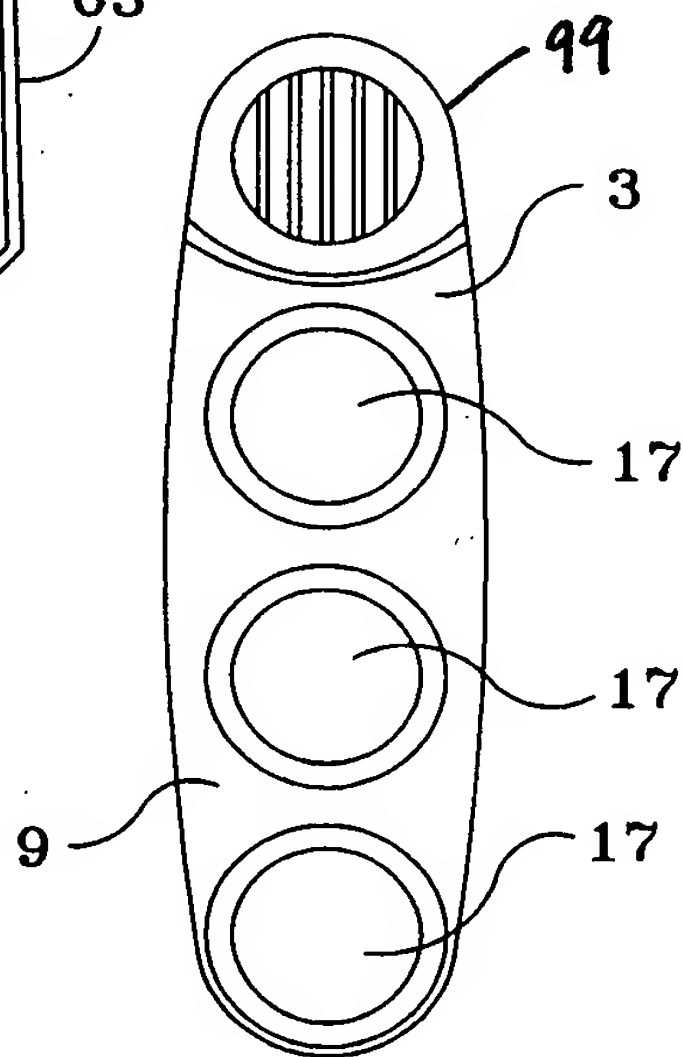


Figure 4

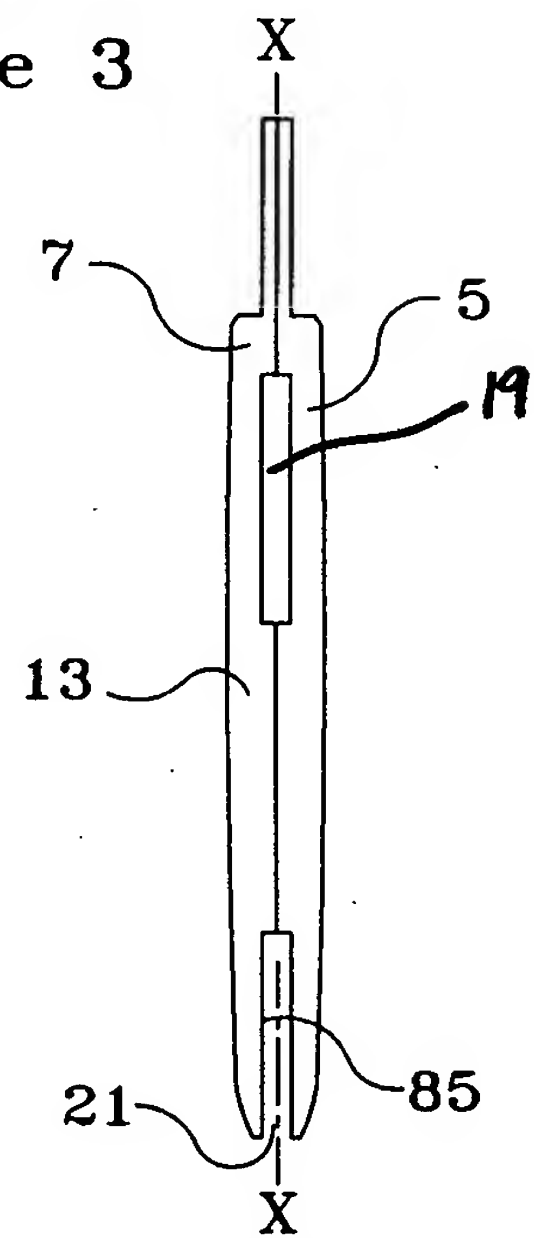


Figure 5